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July 24, 2024

Via ECF

United States District Court for the
Southern District of New York
40 Foley Square,
New York, New York 10007
Attn: Hon. Valerie E. Caproni

Re: *Henri v. Thelus et al*
 Case No. 1:24-cv-00329-VEC

Dear Judge Caproni,

Our firm represents the defendants, Theriel Thelus and Senet D. Achill (“Defendants”). On July 12, 2024, plaintiff filed opposition papers to our second motion to dismiss. We are currently waiting for certified documents from Haiti and request an additional 14 days to file our reply papers. The current deadline is July 26, 2024.

We have contacted Mr. Altman’s office for his consent but have not heard back.

Respectfully submitted,

/s/ Daniel S. Szalkiewicz

By: Daniel S. Szalkiewicz, Esq.